

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:23-cr-00535
)	
Plaintiff,)	JUDGE CHRISTOPHER A. BOYKO
)	
vs.)	
)	
DANIEL KOVACIC,)	<u>DEFENDANT'S MOTION TO</u>
)	<u>CONTINUE TRIAL</u>
Defendant.)	
)	

Now comes Defendant Daniel Kovacic, by and through his undersigned counsel Marisa L. Serrat, and hereby respectfully requests this Honorable Court to continue the trial, currently scheduled for May 12, 2025, to another date that is convenient for this Honorable Court. Counsel has discussed this request with AUSA Brian S. Deckert who has indicated that the government does not oppose this request. This request for continuance is made in good faith and for the purpose of promoting the ends of justice. The parties are actively engaging in plea negotiations and need additional time to complete that process. During the April 28, 2025 status conference, the defense orally requested a continuance of the status conference, final pretrial, and trial dates in order to ensure that the Defendant has had sufficient time to review the discovery material in this case and make a decision on how he would like to proceed forward.

Mr. Kovacic has been advised that he is entitled to the commencement of a trial within seventy (70) days after his arraignment, or the filing of an indictment, whichever occurs later; or that the case against him shall be dismissed pursuant to the Speedy Trial Act. In the instant case, having full knowledge of the particulars of the Speedy Trial Act as they

relate to the dismissal of cases for failure to commence trial, the defendant respectfully submits that the interests of justice will be best served by granting the continuance requested herein.

Based upon the foregoing, the Defendant respectfully request this Honorable Court to continue the trial to another date that is convenient for the Court.

Respectfully Submitted,

s/ Marisa L. Serrat
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CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ Marisa L. Serrat
JAIME P. SERRAT LLC
Marisa L. Serrat, (#00888410)